

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION, ET AL.,

Defendants.

Civil Action No. 1:23-cv-10511-WGY

GABRIEL GARAVANIAN, ET AL.,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION, ET AL.,

Defendants.

Civil Action No. 1:23-cv-10678-WGY

**DECLARATION OF WILLIAM H. STALLINGS IN SUPPORT OF OBJECTIONS OF
SOUTHWEST AIRLINES CO. TO PRODUCTION OF HIGHLY CONFIDENTIAL
INFORMATION TO PRIVATE ACTION PLAINTIFFS**

I, William H. Stallings, declare that I am licensed to practice law in Washington, D.C. and admitted pro hac vice to this Court. I am a partner in the law firm of Mayer Brown LLP and counsel of record for Southwest Airlines Co. I submit this declaration in support of the Objections of Southwest Airlines Co. to Production of Highly Confidential Information to

Private Action Plaintiffs. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, I could and would competently do so under oath.

1. Attached hereto as **Exhibit A** is a true and correct copy of a March 23, 2023 email from John Thornburgh of DOJ to William Stallings.

2. Attached hereto as **Exhibit B** is a true and correct copy of the Department of Justice's subpoena served on Southwest Airlines Co. in *United States et al. v. JetBlue Airways Corp. et al.* (No. 23-cv-10511).

3. Attached hereto as **Exhibit C** is a true and correct copy of JetBlue Airways Corporation's subpoena served on Southwest Airlines Co. in *United States et al. v. JetBlue Airways Corp. et al.* (No. 23-cv-10511).

4. Attached hereto as **Exhibit D** is a true and correct copy of an Order entered by the Ninth Circuit Court of Appeals in *Taleff v. Southwest Airlines*, No. 11-cv-161793, Dkt. #31 (9th Cir., Aug. 30, 2011).

5. Attached hereto as **Exhibit E** is a true and correct copy of Defendant's Motion for Sanctions in *Taleff v. Southwest Airlines*, No. 11-cv-161793, Dkt. #24 (9th Cir., Aug. 30, 2011).

6. Attached hereto as **Exhibit F** is a true and correct copy of an Order Granting LGE's Motion for Sanctions, *Terry v. LG Electronics, Inc.*, No. 08-cv-01559, Dkt. #6201 (N.D. Cal. May 25, 2023).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 5, 2023, in Washington, D.C.

/s/ William Stallings
William Stallings (admitted *pro hac vice*)